

CG Docket No. 03-123

Response to FCC 03-112

Section C Public Access to Information and Outreach

The staff of the Oregon Public Utility Commission (PUC) is submitting comments in response to the Federal Communications Commission's (Commission) request for input on public access to information and outreach services for telecommunications relay services (TRS)

Section C 128, the Commission mandates specific steps that the carriers need to take in order to ensure that the general public has access to information regarding TRS. Such steps include publishing TTY and TRS numbers in telephone directories, occasional billing inserts and directory assistance and any other method to ensure that callers in their service areas are aware of the availability and use of all forms of TRS.

The PUC has adopted rules to help enforce the mandates laid out by the FCC. PUC works with the OTRS Industry Advisory Committee, made up of representatives from the telecommunications provider industry, to outreach to telephone carriers to ensure that they are complying with Oregon statutes and administrative rules that outline the carriers' responsibilities towards providing information about Oregon Telecommunications Relay Services (OTRS). In addition, as part of the contract for relay services, provided through Sprint Relay, PUC requires that the Sprint account manager for OTRS periodically review telephone directories and coordinate publication of billing inserts and other forms of written notifications, such as the OTRS TODAY newsletter, which is distributed twice a year to consumers.

Section C 129, the Commission notes that these rules may not be entirely effective in promoting public awareness about TRS issues and seeks comments from TRS providers on whether these current mandates are sufficient in requiring TRS outreach. In addition, the Commission asks for the current rate of hang-ups on TRS calls, how many are attributable to customer confusion and how effective are the outreach efforts at addressing these issues?

The PUC finds that telephone directories are not an effective means to provide information and outreach to TRS consumers who are speech impaired, deaf, or hard of hearing, as well as consumers without a disability. One reason is due to the recent trend for telephone companies to sell their directories to independent businesses. It is becoming increasingly difficult to enforce rules with these companies who are not telephone carriers or providers. Placement of TRS information is inconsistent. In some places, directories name the service the "Oregon Deaf Relay," and others note it as a telephone interpretation service. Some directories place the information in the social service section, and others in government and community services. This makes it difficult for consumers, particularly voice users, to make calls to speech or hearing impaired individuals without knowing how to find the information in the telephone directory. Further, if a hearing person or a business does not know about the relay service, they may not notice any descriptions that are written about the relay service.

Developing and printing consistent billing inserts can be time consuming and costly. The last project that involved sending out billing inserts about TRS was in October 2000, to announce the rollout of 711. There appeared to be little or no increase in the number of TRS calls resulting from that advertisement. Anecdotally, we know that people tend to throw away billing inserts without reading them.

It is also difficult for PUC to gauge the number of hang-ups on TRS calls, given that all TRS calls require confidentiality, and information such as the number of hang-ups cannot be recorded. We also do not receive formal complaints from consumers who have been hung up on. However, as part of our outreach campaign to businesses last year, we sent out a survey through our bi-annual OTRS TODAY Newsletter. We received 150 responses back listing businesses and other organizations that habitually hang up on OTRS callers. Most likely these businesses assume that because the relay agent introduces the call, that the caller is a telemarketer.

In Section C 130, the Commission asks for comments on additional outreach requirements that should be required of TRS providers, whether there are successful state programs to model a national program on and the role that federal funding may contribute.

In its TRS contract, PUC has incorporated approximately 120,000 dollars per year for outreach. Each year, PUC works with a public relations or advertising firm to coordinate an outreach effort that is targeted to a specific population. The first year of outreach was focused on the general population, the second year on senior citizens who are hard of hearing, the third year on 711, the fourth year on businesses and speech impaired individuals and this year we will continue educating the businesses and the Hispanic population. We have found different approaches are best for each target population. One example is with the business community. Our outreach focused on the fact that hanging up on TRS callers meant hanging up on potential dollars that these consumers would spend at their businesses—and that the only cost to businesses to answer these calls was common courtesy. A business kit was developed, including a six-minute video on a CD for people to review and gain an understanding of TRS. This kit was available for businesses to use to train their employees. One result of this outreach was that a major airline requested kits so that they could train their employees on a nation-wide basis.

For speech-impaired individuals, we found it was effective to outreach to both speech pathologists and the community by hiring a speech pathologist familiar to this disability population. One-on-one training and presentations conducted by the speech pathologist allowed time for participants to ask questions and have contact information available for future queries. TRS calls during this period of outreach more than tripled from speech impaired individuals. The PUC would be happy to send reports and materials used upon the Commission's request.

One method of outreach that has not been tried by the PUC is prime time advertisement on television. In the past, PUC has distributed a public service announcement on the

relay, but this announcement was shown low viewer times, particularly after midnight, when fewer people would benefit from information on the relay. Because of budget constraints, it is not feasible for PUC to advertise OTRS on prime time television.

In Section C 131, the Commission asks for comments on whether states should have the obligation to reimburse intrastate TRS providers for any additional outreach requirement adopted by the Commission as a result of the current solicitation of input from TRS providers and whether the Interstate TRS Fund should reimburse interstate TRS providers for such outreach

Currently, PUC is providing intrastate outreach through its contract through Sprint Relay. We expect to continue to provide outreach services for the state of Oregon on TRS. We agree that outreach specific to the State of Oregon should be financially sponsored by the state of Oregon's contract for TRS. However, Oregon's economic condition would prohibit picking up the costs of nationwide mandates above and beyond what it currently provides through the TRS contract

Should the Commission require interstate or national outreach, the most effective method may be a national advertising campaign on television, similar to the advertisements done by Maryland Relay, Montana Relay and Virginia Relay, as well as advertising campaigns coordinated by Hamilton Relay. It is our understanding that such advertising campaigns were effective when done by those providers

Finally in Section C 133, the Commission seeks comment on how, if the Commission were to require a coordinated outreach campaign, such a campaign could be funded and whether the Interstate TRS Fund should contribute to this outreach effort, and whether portions of an outreach campaign designed for implementation at the state level must be paid for by the states

PUC agrees that outreach funds from a national campaign should come from the Interstate TRS Fund. This seems to be an appropriate use of funding contributed by carriers for issues related to interstate TRS

PUC finds it difficult to formulate a response to this request for input. There are potential factors that may impact Oregon's TRS budget if the Commission passed such a mandate. For example, if the Commission required a coordinated outreach campaign and required states to implement the coordinated campaign in their state, how would the Commission determine how to allocate the cost to each state? Would this be in proportion to the population, or to the amount of funds allocated to the TRS budget of each state? How would the Commission determine whether the state could reasonably afford the cost of the coordinated outreach effort? Given the current financial picture that Oregon and other states are in, it would be difficult to commit toward a coordinated campaign without understanding further the scope of the campaign, the potential cost and how the funds can be allocated to each state.

In summary, PUC encourages the Commission to continue to explore different ways to provide a cost-effective national campaign to increase the awareness of TRS for all disabled and non-disabled users. These comments are from the PUC staff, and are not the statement of the official position of the Oregon Public Utility Commission. If you need further information, please contact me at damara.paris@state.or.us or 503.373.1413 TTY.

Sincerely,

Damara Paris, RSPF Manager
Telecommunication Assistance Program